

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

HIT NOTION LLC,

Plaintiff,

v.

SANDERS COLLECTION
INCORPORATED,

Defendant.

Case No. 24-cv-10937

Honorable Robert J. White

STIPULATED ORDER TO STAY PROCEEDINGS

The parties here submit, by stipulation, that:

1. Plaintiff Hit Notion LLC (“Hit Notion”) commenced this action alleging claims for infringement of certain design patents pertaining to a pillow product, and breach of contract.
2. Defendant Sanders Collection Inc. (“Sanders”) served an answer denying the salient allegations in Hit Notion’s complaint and asserting counterclaims for declaratory judgment of noninfringement and invalidity of the patents-in-suit, as well as for breach of contract.

3. Sanders has filed requests for ex parte reexamination of the patents-in-suit with the United States Patent and Trademark Office (“USPTO”).
4. Hit Notion has indicated its intention to amend its complaint to assert claims for infringement of a utility patent that is related to the patents-in-suit and is expected to issue in the coming months.
5. Sanders has indicated that it plans to seek leave to amend its answer and counterclaims based on information uncovered in the course of discovery in this action.
6. On June 6, 2025, Hit Notion issued a subpoena to non-party Amazon.com, Inc., seeking certain records concerning Sanders’s sales and advertising on the Amazon.com platform (the “Amazon Subpoena”).
7. Sanders has indicated it intends to challenge that subpoena via a motion to quash;

Accordingly, pursuant to the parties’ stipulation, and with the Court being fully advised;

IT IS HEREBY ORDERED that this action shall be stayed for a period of not less than three months, except:

1. Notwithstanding the stay, Sanders and any other person seeking to challenge the Amazon Subpoena shall have leave to file a motion

pertaining to the Amazon Subpoena on or before June 30, 2025. Any such motion will be considered by the Court in due course notwithstanding the stay.

IT IS FURTHER ORDERED that three months from the date of this order, the Court will hold a conference to consider whether any further stay is appropriate.

IT IS FURTHER ORDERED that, except as provided above, all discovery and other deadlines in this matter are hereby suspended and will be reset upon the conclusion of the stay.

SO ORDERED.

Dated: June 25, 2025

s/Robert J. White

Robert J. White

United States District Judge

STIPULATED TO:

Dated: June 23, 2025

HOWARD & HOWARD

Attorneys for Plaintiff

HODGSON RUSS LLP

Attorneys for Defendant

By: /s/Andrew M. Grove

Andrew M. Grove

450 West Fourth Street

Royal Oak, Michigan 48067-2557

(248) 645-1483

By: /s/Patrick J. Hines

Patrick J. Hines

140 Pearl Street, Suite 100

Buffalo, New York 14202-4040

(716) 848-1679